

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY AVERAGE WHOLESALE PRICE LITIGATION))))	MDL NO. 1456 CIVIL ACTION NO. 01-12257-PBS
THIS DOCUMENT RELATES TO ALL ACTIONS))))	Hon. Patti B. Saris

MOTION FOR LEAVE TO FILE UNDER SEAL

AstraZeneca Pharmaceuticals LP, by its attorneys, hereby moves this Court for leave to file under seal the Reply Memorandum of Law in Further Support of AstraZeneca Pharmaceuticals LP's Motion for Summary Judgment and Defendant AstraZeneca Pharmaceuticals LP's Summary of Undisputed Facts (attached to the Reply Memorandum as Appendix A).

Pursuant to the Protective Order entered by this Court on December 13, 2002 (the "MDL Protective Order"), the parties in the above captioned cases have designated many documents and other information produced in these cases as either "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL." The Summary of Undisputed Facts and the Reply Memorandum of Law in Further Support of AstraZeneca Pharmaceuticals LP's Motion for Summary Judgment incorporate documents and deposition testimony given by Class 1 representatives Leroy Townsend and Robert Howe that have been designated "HIGHLY CONFIDENTIAL." Pursuant to paragraph 15 of the MDL Protective Order, any document or pleading containing quotes from or otherwise referencing such information shall be filed under seal.

WHEREFORE, AstraZeneca Pharmaceuticals LP respectfully requests that this Court grant it leave to file the Reply Memorandum of Law in Further Support of AstraZeneca Pharmaceuticals LP's Motion for Summary Judgment and Defendant AstraZeneca Pharmaceuticals LP's Summary of Undisputed Facts under seal.

Dated: Boston, Massachusetts
April 28, 2006

Respectfully Submitted,

By: /s/ Jessica V. Barnett

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, by sending on April 28, 2006, a copy to LexisNexis File & Serve for posting and notification to all parties.

/s/ Jessica V. Barnett
Jessica V. Barnett